## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Governor Jesse Ventura, a/k/a James G. Janos, an individual,

Civil No. 0:12-cv-00472

Plaintiff,

vs.

DECLARATION OF JEREMIAH DINNELL

Chris Kyle, an individual,

Defendant.

- I, Jeremiah Dinnell, do state that the following facts are true and correct to the best of my knowledge and belief:
- 1. I provide this Declaration based on my personal knowledge and information and do so from San Diego, California.
- 2. I am an active-duty Navy SEAL and was a member of SEAL Team 3. I am currently stationed at Naval Special Warfare Group 1 with Tradet Assaults out of San Diego, but reside primarily in Mississippi with my wife and children.
- 3. I first met Chris Kyle in September or October 2003. We were in sister platoons within SEAL Team 3. Chris was in Charlie Platoon. I was in Delta Platoon. Our platoons went on a road trip together, which is when I met him.
- 4. Chris and I were twice on the same deployment. We were both in Baghdad—I arrived there at the start of 2005. We were also both in Ramadi, Iraq—I

arrived there in April 2006. After the 2006 deployment I went to Kuwait to reenlist. I have also been deployed to Afghanistan.

- 5. During the 2006 deployment, Chris and I were the lead snipers for our platoons. During engagements with the enemy, I would hear his sniper rifle and he would hear mine.
- 6. Since the day I met him, Chris has been like a big brother to me and our entire team. He was always there for us and I consider him a very close friend.
- 7. I know he wrote a book titled *American Sniper*. I've read the first part of it, but have not yet finished it. I don't know whether he mentions me in the book or, if so, what alias he may have used in place of my name.
- 8. Mikey Monsoor was one of my best friends and I was a pallbearer at his funeral.
- 9. After his funeral, Mikey's friends and family gathered at McP's Irish Pub, a bar on Orange Avenue in Coronado, California. I arrived at 3 or 4 p.m., while it was still light out. I did not drink much that afternoon and evening. I wasn't handling Mikey's death very well at all, and I knew better than to get drunk.
- 10. While I was at McP's, Jesse Ventura arrived. I think it was near dusk, maybe 5 or 6 p.m.
- I heard Ventura's loud mouth, recognized him, and went over to introduce myself. I offered to buy him a beer. He said no—that he didn't drink. He said he actually couldn't drink because he was on medication as a result of a wrestling injury.

- 12. I eventually left McP's because I didn't like the way Ventura was acting. He was being a jackass. He obviously wanted to be the center of attention. He was talking really loud, telling stories about Vietnam, being the governor of Minnesota, and his wrestling days. He clearly wanted people to know who he was.
- 13. He was also talking some about the war in Iraq. He was saying that stuff happening overseas was stupid. He started to get political, and that's when I left. I didn't want to listen to anything he had to say. That night was supposed to be about our buddy who was killed when he jumped on a grenade to save the lives of his teammates.
- 14. I went to another bar, about half a block away, called Danny's. I was maybe there for a couple of hours.
- 15. When I came back to the patio at McP's, I saw that Ventura was talking to Chris and that a little group had formed around them. I heard Ventura say that we shouldn't be over in Iraq, doing what we were doing. He said we shouldn't be doing the types of missions we were doing. And then he said that the SEALs deserved to lose some guys because of what we were doing.
- 16. That's when Chris punched him. All of us wanted to. Chris was just the first one to pop him.
- 17. I did not take Ventura's statement that the SEALs deserved to lose some guys to mean that deaths were inevitable given the nature of our missions. Instead, I took him to mean that my teammates and I deserved to die because we were doing something wrong by fighting the war in Iraq.

- 18. Chris's punch landed on Ventura's face and knocked him to the floor. One of Ventura's friends helped him up. Meanwhile, Chris and I and some others left.
- 19. I don't recall whether Ventura took a swipe at Chris before Chris punched him. But Ventura had taken on an aggressive posture: he was standing up and his voice was getting louder and louder.
- 20. During the entire interaction with Ventura, Chris was in control. I don't know how much he had been drinking, but he had his wits about him. He understood what he was saying and his speech was not slurred. He was not visibly drunk.
- 21. The fight between Chris and Ventura was well-known all over the West Coast SEAL teams within a week, long before Chris wrote his book. Often, new guys would join a team, hear about Chris and his sniping abilities and ask, isn't that the guy who knocked out Jesse Ventura?
- 22. Chris is a humble person and a guy to look up to. I've always looked up to him. I have a lot of respect for him. I've never known him to lie to me.

I certify under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge and belief.

Dated at San Diego, California, \( \) day of \( \) \( \) \( \) \( \) \( \) 2012.

Jeremiah Dinnell